

Approved by: \_\_\_\_\_

David Presley  
Special Assistant United States Attorney

Before: THE HONORABLE MARTIN R. GOLDBERG  
United States Magistrate Judge  
Southern District of New York

19mj 4507

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UNITED STATES OF AMERICA : MISDEMEANOR  
 : COMPLAINT  
 :  
 -v- : Violation of  
 : NYSPL 155.25  
 :  
 BARBARA ROBERTSON :  
 :  
 Defendant : COUNTY OF OFFENSE:  
 : ORANGE  
 :  
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SOUTHERN DISTRICT OF NEW YORK, ss.:

CRAIG TRUMBELL, being duly sworn, deposes and says that he is a Court Liaison, assigned to the Provost Marshal Office, at the United States Military Academy, West Point, New York, and charges as follows:

COUNT ONE


On or about March 14, 2019 at the United States Military Academy, West Point, New York, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, BARBARA ROBERTSON, the defendant, unlawfully, knowingly and willfully stole property of another to wit, the defendant stole a handbag from the West Point Post Exchange.

(New York State Penal Law, Section 155.25)

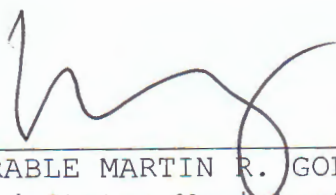
The basis for the deponent's knowledge and for the foregoing charges are, in part, as follows:

1. I am a Court Liaison, assigned to the Provost Marshal Office, at the United States Military Academy, West Point, New York, which is located in the Southern District of New York.
2. On or about March 14, 2019 at approximately 1:50 p.m., West Point Post Exchange (PX) Loss Prevention contacted SPC Anthony Sairrino, Military Police (MP), and informed him that the defendant stole a handbag from the PX. SPC Sairrino conducted field interviews and took the sworn statements of four PX employees involved.
3. The MP obtained from the defendant the receipt for the defendant's initial purchase, and the receipt for when the defendant was escorted back into the PX and purchased the handbag. The MP also reviewed the CCTV footage of the interactions between the defendant and the register attendant. The MP observed the register attendant remove the handbag in question from the bagging area several times, with the defendant returning it to the bagging area each time. The register attendant finally rotated the shopping bag containing the handbag away from the defendant, and the defendant took and left with that shopping bag. The receipts show that the defendant did not purchase the bag until escorted back into the PX.
3. On March 14, 2019, the defendant was issued a District Court Violation Notice for Petit Larceny (DCVN number 7553191/SY10).

**WHEREFORE**, deponent prays that the above-named defendant be imprisoned or bailed, as the case may be.

  
CRAIG TRUMBULL  
Court Liaison

Sworn to before me this 10th day of May 2019.

  
HONORABLE MARTIN R. GOLDBERG  
United States Magistrate Judge  
Southern District of New York